

Exhibit A
Proposed Order

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Robert A. Julian (SBN 88469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
San Francisco, CA 94111
Telephone: 628.208.6434
Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Blvd., Suite 1400
Los Angeles, CA 90025-0509
Telephone: 310.442.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: lattard@bakerlaw.com

*Counsel for Official Committee
of Tort Claimants*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING APPLICATION
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS FOR ENTRY OF
AN ORDER (I) CONFIRMING THE
SCOPE OF EMPLOYMENT OF BAKER
& HOSTETLER LLP, OR
ALTERNATIVELY (II) AMENDING
THE ORDER APPROVING
APPLICATION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
PURSUANT TO 11 U.S.C. § 1103 AND
FED. R. BANKR. P. 2014 AND 5002,
FOR AN ORDER AUTHORIZING
RETENTION AND EMPLOYMENT OF
BAKER & HOSTETLER LLP,
EFFECTIVE AS OF FEBRUARY 15,
2019 (DKT. NO. 1331) (THE
“RETENTION ORDER”)**

1 Upon the Application, filed September 26, 2019, (the “**Application**”),¹ of the Official
2 Committee of Tort Claimants (the “**TCC**”) of PG&E Corporation and Pacific Gas and Electric
3 Company (collectively, the “**Debtors**”) for an order either (i) confirming that the scope of Baker
4 & Hostetler LLP’s employment (“**Baker**”) pursuant to the Retention Order includes representation
5 of the TCC in connection with the California North Bay Fire Cases, JCCP 4955 (the “**State Court**
6 **Litigation**”), or (ii) amending the Retention Order to expressly provide that Baker is authorized
7 to represent the TCC in the State Court Litigation, and this Court having jurisdiction to consider
8 the Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, *Order*
9 *Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.),
10 and Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the
11 Northern District of California (the “**Bankruptcy Local Rules**”); and consideration of the
12 Application and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and
13 venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court
14 having found and determined that notice of the Application as provided to the parties listed therein
15 is reasonable and sufficient; and it appearing that no other or further notice need be provided; and
16 this Court having reviewed the Application; and it appearing that the relief requested in the
17 Application is in the best interests of the Debtors, their estates, creditors, shareholders, and all
18 parties in interest; and upon all of the proceedings had before this Court and after due deliberation
19 and sufficient cause appearing therefor,

20 **IT IS HEREBY ORDERED THAT:**

- 21 1. The Application is approved to the extent set forth herein.
- 22 2. The TCC is authorized, pursuant to section 1103 of the Bankruptcy Code and
23 Bankruptcy Rules 2014(a) and 5002, to employ and retain Baker as counsel to represent the TCC
24 in connection with the State Court Litigation, effective as of August 21, 2019.
- 25 3. Other than as provided in paragraph 2 above, the Retention Order shall continue to
26 govern the terms of Baker’s employment.
- 27

28

¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms in the Application.

1 4. To the extent that there may be any inconsistency between the terms of the
2 Application and this Order, the terms of this Order shall govern.

3 5. The relief granted herein shall be binding upon any chapter 11 trustee appointed in
4 the Cases, or upon any chapter 7 trustee appointed in the event of a subsequent conversion of the
5 Cases to cases under chapter 7.

6 6. The TCC is authorized to take all steps necessary or appropriate to carry out this
7 Order.

8 7. This Court shall retain jurisdiction to hear and determine all matters arising from
9 or related to the implementation, interpretation, or enforcement of this Order.

10
11 ** END OF ORDER **
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28